

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
EASTERN DIVISION**

RUTH NORWOOD

PLAINTIFF

VS.

CAUSE NO. 2:21-cv-149-KS-MTP

**GEORGIA-PACIFIC MONTICELLO LLC,
JOHN DOES 1-5 AND XYZ CORPORATIONS 1-5**

DEFENDANTS

NOTICE OF REMOVAL

TO: Cory M. Williams
L. O'Neal Williams, Jr.
WILLIAMS, WILLIAMS & MONTGOMERY, P.A.
140 Mayfair Road, Suite 1100
Hattiesburg, MS 39402
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James Brister
Lawrence County Circuit Court Clerk
P.O. Box 1249
Monticello, MS 39654

In accordance with 28 U.S.C. § 1446(b), you are hereby notified that the Defendant, Georgia-Pacific Monticello LLC, has removed this action from the Circuit Court of Lawrence County, Mississippi, to the United States District Court for the Southern District of Mississippi, Eastern Division, and supports this removal as follows:

1. On July 26, 2021, the Plaintiff, Ruth Norwood, filed her Complaint against Georgia-Pacific Monticello LLC in the Circuit Court of Lawrence County, Mississippi. A copy of the state court file is attached hereto as Exhibit "A."

2. The instant Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b). Service on the Defendant, Georgia-Pacific Monticello LLC was effectuated on October 25, 2021.

3. The aforementioned civil action is one of which this Court has original jurisdiction pursuant to the provisions of 28 U.S.C. § 1332, and the action may be removed to this Court by the Defendant pursuant to the provisions of 28 U.S.C. § 1441(a) and 28 U.S.C. § 1446(b) since it is a civil action wherein diversity of citizenship exists and wherein the matter in controversy exceeds the sum or value of \$75,000.00. The Complaint, on its face, fails to specify a total sum, but seeks damages for personal injuries, including (a) personal disability, (b) past and future medical expenses, (c) past, present, and future pain, suffering, and mental anguish, (d) hedonic damages, and (e) lost wages.

4. Diversity of citizenship does exist in this case. The Plaintiff alleges in her Complaint that she is a resident of Jefferson Davis County, Mississippi. *See* Exhibit A, Complaint at ¶ 1. Defendant, Georgia-Pacific Monticello LLC is a limited liability company (hereinafter “LLC”) organized and existing under the laws of the State of Delaware with its principal place of business located in Atlanta, Georgia. Georgia-Pacific Monticello LLC’s sole member is GP Containerboard Operations LLC, a Delaware LLC; GP Containerboard Operations LLC’s sole member is GP Packaging and Cellulose Operations Holdings LLC, a Delaware LLC; GP Packaging and Cellulose Operations Holdings LLC’s sole member is GPPC Equity Holdings LLC, a Delaware LLC; GPPC Equity Holdings LLC’s sole member is Georgia-Pacific LLC, a Delaware LLC; Georgia-Pacific LLC’s sole member is Georgia-Pacific Holdings, LLC, a Delaware LLC; Georgia-Pacific Holdings, LLC’s sole member is Georgia-Pacific Equity Holdings LLC, a Delaware LLC; Georgia-Pacific Equity Holdings LLC’s sole member is Koch Renewable Resources, LLC, a Delaware LLC; Koch Renewable Resources, LLC is wholly owned by Koch

Industries, Inc., an entity incorporated under the laws of Kansas and, at all times since this action commenced, with its principal place of business and its corporate headquarters located in Wichita, Kansas. Therefore, Georgia-Pacific Monticello LLC, for jurisdictional purposes, is a citizen of Kansas. Hence, complete diversity exists between the Plaintiff and the Defendant.

5. The entire state court record is attached as Exhibit “A.”

6. The Defendant is serving a copy of the Notice of Removal on the Plaintiff through her attorney of record and on the Circuit Clerk of Lawrence County, Mississippi.

Respectfully submitted, this the 23rd day of November, 2021.

/s/ C. Maison Heidelberg
C. MAISON HEIDELBERG, MB #9559
Attorney for the Georgia-Pacific Monticello LLC

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, C. Maison Heidelberg, attorney for the Defendant, Georgia-Pacific Monticello LLC, do hereby certify that I have this day served a true and correct copy of the above and foregoing document via the court's electronic filing system on the following:

Cory M. Williams
L. O'Neal Williams, Jr.
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James Brister
Lawrence County Court Clerk
P.O. Box 1249
Monticello, MS 39654

THIS, the 23rd day of November, 2021.

/s/ C. Maison Heidelberg
C. MAISON HEIDELBERG